

A local association of employees that otherwise meets the requirements of section 501(c)(4) of the Internal Revenue Code of 1954 provides that retired employees who were members of the association at the time of retirement will have life-time membership and will be eligible to hold office. A retiree's participation in the association's activities or eligibility to hold office does not differ from that of an active employee. However, a retiree is not required to pay annual dues.

Held, the term "employees" also includes retired employees who were members of the association at the time of retirement for purposes of section 501(c)(4) of the Code.